

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NAPLETON'S ARLINGTON HEIGHTS  
MOTORS, INC., et al.,

Plaintiffs,

v.

FCA US LLC, a Delaware corporation,

Defendant.

No. 1:16-cv-00403-VMK-SMF

Hon. Sheila Finnegan

**PLAINTIFFS' MOTION FOR LEAVE  
TO FILE DOCUMENTS UNDER SEAL**

Plaintiffs, Napleton Arlington Heights Motors, Inc., *et al.*, hereby move pursuant to this Court's Confidentiality Order (Doc. 88) for leave to file under seal *Plaintiffs' Motion To Compel FCA's Production Of Documents In Unredacted Form And Disclosure Of Identities Of Witnesses Referenced In The Documents* (Doc. 208).

In support of their motion to file under seal, Plaintiffs state as follows:

1. On December 15, 2017, FCA produced to Plaintiffs for the first time interview notes, memoranda, and documents prepared or collected by an FCA internal investigations team during 2015.
2. FCA has marked those documents "Highly Confidential – Attorneys' Eyes Only."
3. Plaintiffs do not believe that this confidentiality designation under this Court's Confidentiality Order is appropriate for these documents.
4. Plaintiffs have referenced portions of these FCA internal investigation documents throughout their Motion to Compel, and have attached the documents in their entirety as exhibits.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request permission to provisionally file under seal their *Motion To Compel FCA's Production Of Documents In Unredacted Form And Disclosure Of Identities Of Witnesses Referenced In The Documents* until at least such time as the Court rules on the appropriateness of FCA's confidentiality designation.

Dated: January 24, 2018

Respectfully submitted,

The Napleton Plaintiffs

By: /s/ Jeannie Evans

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this document will be served upon counsel of record electronically through the CM/ECF system on January 24, 2018.

/s/ Jeannie Evans  
Jeannie Y. Evans